

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

**FILED**

**JAN 03 2013**

WILLIE E. BOYD,  
Petitioner,

v.

JAMES CROSS, Warden,  
Respondent.

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

Case No. 3:12CV733(DRH-DGW)

**PETITIONER'S MOTION REQUEST FOR LEAVE TO FILE  
ADDITIONAL PAGES IN HIS REPLY MOTION**

**COMES NOW**, Petitioner Willie E. Boyd, proceeding pro se without the aid of counsel, request that this Honorable Court grant the petitioner's motion for leave to file additional pages in his reply to the Government's Response motion. (Doc. # 20). The Petitioner submits the following reasons why this motion should be granted:

1. On December 11, 2012 this Court granted the Respondent an additional extension of time to file its response motion, due by December 17, 2012. The court also granted the Petitioner 30-days to file its reply motion, due by January 16, 2013. (Doc. # 18).
2. The Petitioner has prepared his reply motion, but need additional pages to fully inform the court concerning the issues of law and facts pertinent to the Government's response motion. The Petitioner is not trained in the field of law, and is preparing its reply motion without the aid of trained counsel.
3. The Petitioner's request to file the additional pages with the reply motion, is not to vex the court in any manner, but with hopes of putting all the facts on the table cloaked in the law, as best as this pro se litigant can, in an attempt to put forth a coherent reply. There exist complex issues of law and facts. The additional pages will assist the court in

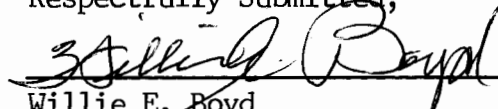
making its decision based on law and facts as best the petitioner can articulate them.

4. The Court's granting of this motion for additional pages in the reply motion would not prejudice the Respondent, and the petitioner doubts if the Respondent would oppose the court granting the motion.

**WHEREFORE**, Petitioner Willie E. Boyd, prays that the Court grant leave to allow petitioner to file his reply motion with additional pages.

[Dated: 2, January, 2013].

Respectfully Submitted,

  
Willie E. Boyd

# CERTIFICATE OF SERVICE

I, Willie E. Boyd hereby certify that I have served a true and correct copy of the following:

**Petitioner's Motion Request for Leave to File  
Additional Pages in His Reply Motion**

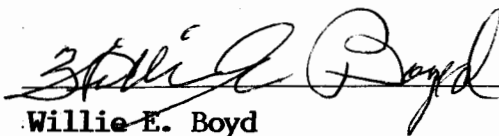
Which is deemed filed at the time it was delivered to prison authorities for forwarding, *Houston v. Lack*, 101 L.Ed. 2d 245 (1988), upon the defendant/defendants and or his attorney/attorneys of record, by placing same in a sealed, postage prepaid envelope addressed to:

**James M. Hipkiss  
Assistant United States Attorney  
Nine Executive Drive  
Fairview Heights, IL. 62208**

And deposited same in the United States Mail at the Federal Correctional Institution at Greenville, Illinois.

I declare, under penalty of perjury (Title 28 U.S.C. §1746), that the foregoing is true and correct.

Dated this 2 day of January, 2013.



**Willie E. Boyd  
# 18498-044  
Federal Correctional Institution  
P.O. Box 5000, 3-B  
Greenville, IL. 62246**